

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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	)	
<b>IN RE:</b>	)	<b>Chapter 11</b>
	)	
<b>W.R. GRACE &amp; CO., et al.,</b>	)	<b>Case No. 01-01139 (JKF)</b>
	)	<b>Jointly Administered</b>
	)	
<b>Debtors.</b>	)	
	)	<b>Related to Docket No. 20212, 20233</b>
	)	<b>Hearing Date: December 15, 2008</b>
	)	<b>Objection Deadline: December 10, 2008</b>

**JOINDER OF MOTLEY RICE LLC IN THE LIMITED OBJECTION OF VARIOUS  
LAW FIRMS REPRESENTING ASBESTOS PERSONAL INJURY CLAIMANTS TO  
INSURERS' MOTION FOR ENTRY OF CONFIDENTIALITY ORDER**

COMES NOW, Motley Rice LLC, (hereinafter "Motley Rice") a law firm representing various asbestos personal injury claimants, and hereby files this Joinder in the Limited Objection of Various Law Firms Representing Asbestos Personal Injury Claimants to Insurers' Motion for Entry of Confidentiality Order. In support of its Response, Motley Rice states as follows:

Motley Rice hereby and herewith joins in, adopts and incorporates by reference the responses of other Claimants' counsel including the Limited Objection of Various Law Firms Representing Asbestos Personal Injury Claimants to Insurers Motion for Entry of Confidentiality Order filed on December 10, 2008. Motley Rice submits that, as discussed in the Limited Objection of the Various Law Firms, Motley Rice only provided the confidential information to the Debtor in the estimation proceeding because the Court entered several protective orders that ensured that Motley Rice's confidential and protected information would be and would remain protected. The Insurers<sup>1</sup> have not demonstrated that they are entitled to the previously protected

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<sup>1</sup> The Insurers include Arrowood Indemnity Company f/k/a Royal Indemnity Company, Federal Insurance Company, Maryland Casualty Company, Zurich Insurance Company, Zurich International Ltd., Government Employees Insurance Co., and Columbia Insurance Company f/k/a Republic Insurance Company.

confidential information and the Debtors may not waive Motley Rice's interest in the confidentiality of the information.

WHEREFORE, for the reasons stated herein and the reasons stated in the Limited Objection of Various Law Firms to Insurer's Motion for Entry of Confidentiality Order, Motley Rice prays that this Honorable Court decline to approve the Confidentiality Order to the extent it would permit the Insurers to gain access to information in which Motley Rice has a confidentiality interest, that this Court enter an order that the PI Protective Orders continue in full force and effect, that this Court enter an order prohibiting the Debtors from disclosing information that Motley Rice has a continuing interest in confidentiality and that Motley Rice be granted such other necessary relief as this Court deems proper.

This 12th day of December, 2008.

RESPECTFULLY SUBMITTED,

/s/ John Herrick  
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